

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DR. SHIVA AYYADURAI,

Plaintiff,

v.

WILLIAM FRANCIS GALVIN, in his official
capacity as the Secretary of the Commonwealth
of Massachusetts and his individual capacity,
MICHELLE TASSINARI, in her individual
capacity, DEBRA O'MALLEY, in her individual
capacity, AMY COHEN, in her individual capacity,
and NATIONAL ASSOCIATION OF STATE
ELECTION DIRECTORS

Defendant.

CIVIL ACTION
NO. 1:20-cv-11889-MLW

**RESPONSE TO COURT ORDER OF MAY 21, 2021 BY SECRETARY WILLIAM
FRANCIS GALVIN, MICHELLE TASSINARI, AND DEBRA O'MALLEY**

Defendants Secretary William Francis Galvin, Michelle Tassinari, and Debra O'Malley hereby submit this response to the Court's order of May 21, 2021. Defendants do not believe that the disqualification of the presiding judge is required under 28 U.S.C. § 455(a) or 28 U.S.C. § 455(b) based on his association with Felicia Ellsworth, Esq. In any event, Defendants waive any ground for disqualification relating to Ms. Ellsworth pursuant to 28 U.S.C. § 455(e).

Respectfully submitted,

Defendants,

WILLIAM FRANCIS GALVIN, in his official and
individual capacities, MICHELLE TASSINARI, in
her individual capacity, and DEBRA O'MALLEY,
in her individual capacity,

By their attorneys,

MAURA HEALEY
ATTORNEY GENERAL

/s/ Adam Hornstine
Anne Sterman (BBO No. 650426)
Adam Hornstine (BBO# 666296)
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Date: May 27, 2021

CERTIFICATE OF SERVICE

I, Adam Hornstine, Assistant Attorney General, hereby certify that I have this day, May 27, 2021, served the foregoing **Report**, upon all parties, by electronically filing to all ECF registered parties, and paper copies will be sent to those indicated as non-registered ECF participants.

/s/ Adam Hornstine
Adam Hornstine